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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated, LESTER WRESCKIE, in an individual capacity and on behalf of themselves and all others similarly situated, and THOMAS DREIER, in an individual capacity and on behalf of themselves and all others similarly situated,

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation,

DEFENDANT.

3:20-cv-00917-HZ

**DEFENDANT CITY OF PORTLAND'S
UNOPPOSED MOTION TO EXCEED
PAGE LIMIT**

Pursuant to LR 7-2(b), Defendant City of Portland (“City”) moves the Court for an order granting approval for the City to exceed the 35 page or 11,000-word limit for the City’s response to Plaintiffs’ Motion for Class Certification. The City respectfully requests a limit of 75 pages, exclusive of tables of contents, cases, authorities, and exhibits.

The expansion of the page limit is requested to address the significant issues raised in Plaintiffs’ 75-page Motion for Class Certification and other legal and factual issues relevant to class certification in this case.

City attorneys J. Scott Moede, Naomi Sheffield, and Rob Yamachika conferred about this motion via email with Plaintiffs’ attorneys Jesse Merrithew, Ashlee Albies, Juan Chavez, and Franz Bruggemeier on January 26, 2022, and Plaintiffs do not oppose this motion.

This motion is based upon the complete Court file and upon the Declaration of Naomi Sheffield.

Dated: January 26, 2022.

Respectfully submitted,

/s/ Naomi Sheffield

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